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Exhibit A
[PROPOSED] Order

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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19 -30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**[PROPOSED] SECOND ORDER
PURSUANT TO FED. R. BANKR. P.
9006(b) AND 9027 ENLARGING THE
TIME WITHIN WHICH TO FILE
NOTICES OF REMOVAL OF RELATED
PROCEEDINGS**

1 Upon the Motion, dated October 25, 2019 [Docket No. #] (the “**Motion**”),¹ of PG&E
2 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and
3 debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned Chapter 11
4 Cases, pursuant to Bankruptcy Rules 9006(b) and 9027, and Bankruptcy Local Rule 9006-1, seeking
5 a further extension of time for the Debtors to file notices of removal of the civil actions and
6 proceedings to which the Debtors are parties (the “**Civil Actions**”) from October 28, 2019 until the
7 earlier of the effective date of a confirmed chapter 11 plan (the “**Effective Date**”) and June 30, 2020,
8 all as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and
9 the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, *Order Referring Bankruptcy Cases*
10 *and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule
11 5011-1(a); and consideration of the Motion and the requested relief being a core proceeding pursuant
12 to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and
13 1409; and the Court having found and determined that notice of the Motion as provided to the parties
14 listed therein is reasonable and sufficient under the circumstances, and it appearing that no other or
15 further notice need be provided; and this Court having reviewed the Motion, the Wells Declaration (as
16 amended on February 2, 2019 [Docket No. 263]), and the Boken Declaration; and this Court having
17 held a hearing on the Motion; and this Court having determined that the legal and factual bases set
18 forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief
19 requested in the Motion is in the best interests of the Debtors, their estates, creditors, shareholders,
20 and all parties in interest; and it appearing that cause exists to grant the relief requested in the Motion;
21 and upon all of the proceedings had before this Court and after due deliberation and sufficient cause
22 appearing therefor,

23 **IT IS HEREBY ORDERED THAT:**

- 24 1. The Motion is granted as provided herein.

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27 ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such
28 terms in the Motion.

1 2. The deadline by which the Debtors may file notices of removal under
2 Bankruptcy Rule 9027(a) is extended through and including the earlier of the Effective Date and June
3 30, 2020.

4 3. The Debtors are authorized to take all steps necessary or appropriate to carry
5 out this Order.

6 4. This Order shall be without prejudice to any position the Debtors may take
7 regarding whether section 362 of the Bankruptcy Code applies to stay any litigation pending against
8 the Debtors.

9 5. Notwithstanding entry of this Order, nothing herein shall create, nor is it
10 intended to create, any rights in favor of or enhance the status of any claim held by, any party.

11 6. This Court shall retain jurisdiction to hear and determine all matters arising
12 from or related to the implementation, interpretation, or enforcement of this Order.

13 ** END OF ORDER **
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